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November 8, 2021

VIA ECF

Hon. Andrew L. Carter, Jr. United States District Judge Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007



Re: Lopez Catzin et al. v. Thank You & Good Luck Corp et al. Case No.: 15-cv-7109 (ALC)

Dear Judge Carter:

We represent Plaintiffs in this matter. We write to respectfully request an extension to today of the deadlines to move to enter a judgment and for attorneys' fees and costs. This is the fourth and last request, and Defendants consent to this request. The current deadlines are:

- (1) Plaintiffs' motion to be filed by November 5, 2021;
- (2) Defendants' opposition to filed by December 17, 2021; and
- (3) Plaintiffs' reply to be filed by December 31, 2021.

The proposed revised schedule is as follows:

- (1) Plaintiffs' motion to be filed by November 8, 2021;
- (2) Defendants' opposition to filed by December 21, 2021; and
- (3) Plaintiffs' reply to be filed by December 31, 2021.

The reason for this request is that I had a number of mediations last week that went longer than expected, and therefore we needed an additional day to file the motion. Defendants reserve the right to move under Rule 59 for a new trial.

Thank you for your attention to the above.

Respectfully Submitted,

Michael Taubenfeld

HON, ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

Dated: 11/18/2021